

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

STEPHEN PADGETT, Individually and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

RIT TECHNOLOGIES LTD., AMIT
MANTSUR, YOSSI BEN HAROSH,
ERAN EROV, and MOTTI HANIA,

Defendants.

CASE NO. 16-cv-04579 (KM)(JBC)

~~PROPOSED~~ STIPULATED ORDER
EXTENDING DEADLINE FOR
DEFENDANTS TO RESPOND TO
PLAINTIFFS' COMPLAINT AND
SETTING BRIEFING SCHEDULE

Lead Plaintiffs Martin Smilovich and Hershel Smilovich (collectively, "Lead Plaintiffs") and Defendant Amit Mantsur (collectively, with Plaintiffs, the "Parties"), through their undersigned counsel, stipulate as follows:

WHEREAS, on July 28, 2016, Plaintiff Stephen Padgett filed an Complaint in this action in the United States District Court for the District of New Jersey;

WHEREAS, on February 14, 2017, this Court appointed Martin Smilovich and Hershel Smilovich as Lead Plaintiffs;

WHEREAS, on June 7, 2017, this Court ordered service pursuant to the Hague Convention on Defendants, all of whom are citizens of Israel;

WHEREAS, on or around November 6, 2017, the Israeli Central Authority served Mantsur by mail;

WHEREAS, Lead Plaintiffs intend to file an amended and consolidated complaint in this matter;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Lead Plaintiffs, by their undersigned counsel, and Mantsur, by his undersigned counsel, that:

1. Lead Plaintiffs will file their Amended Complaint on or before **February 14, 2018**;
2. Mantsur waives any objections based on failure to serve the Summons and Complaint, but reserves all other rights, including but not limited to objections based on lack of personal jurisdiction;
3. Defendants shall not be required to answer or otherwise respond to the Complaint until Lead Plaintiffs have filed their Amended Complaint or the deadline to file the Amended Complaint has passed;
4. Once Lead Plaintiffs file their Amended Complaint or the deadline to file the Amended Complaint has passed, Defendants shall have **60 days** to answer, move to dismiss, or otherwise respond;
5. Lead Plaintiffs shall have **45 days** to file their response to Defendants' motion to dismiss; and
6. Defendants shall have **30 days** to file their reply to Lead Plaintiffs' response to Defendants' motion to dismiss.

IT IS SO ORDERED.

Dated: 11/22/17



Honorable Kevin McNulty
United States District Court Judge

STIPULATED TO AND APPROVED BY:

/s/ Neil Grossman

Neil Grossman

Bronstein, Gewirtz & Grossman, Esqs.
144 North Beverwyck Road, #187
Lake Hiawatha, NJ 07034
973-335-6409
neil@bgandg.com

Attorneys for Lead Plaintiffs

/s/ Samara Penn Savary

Samara Penn Savary
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Attorneys for Defendant Amit Mantsur